UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

KAREN T. and ROBERT T., SR. for themselves and their minor daughter, N.T.

Plaintiffs,

v.

LINDA S. SPEARS, Commissioner of the DEPARTMENT OF CHILDREN & FAMILIES, and MAURA HEALEY, the Attorney General of the Commonwealth of Massachusetts.

Defendants.

Civil Action No. 1:14-cv-12307-MLW

THE PARTIES' JOINT STATUS REPORT RE: MEDIATION

As this Court encouraged during a lobby conference held on March 24, 2015, counsel for all parties have met in person and communicated repeatedly since that date and now, in accordance with the Court's instruction to report back by May 1, 2015, they state as follows:

- 1. Subject to final approvals, the parties appear to have agreed to settlement terms; at any rate, the undersigned counsel have achieved a mutual understanding as to a settlement in principle.
- 2. Counsel for the parties will update the Court within ten days as to whether final settlement papers have been executed.
- 3. Until such time as a formal notice or stipulation of dismissal is presented to the Court for filing, the Court should retain on its calendar the May 20, 2015 hearing on the defendants' motion to dismiss.

Respectfully submitted,

On behalf of the defendants:

/s/Robert L. Quinan, Jr.

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On behalf of the plaintiffs:

/s/ Barry S. Pollack

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CERTIFICATE OF SERVICE

I certify that this document, filed through the Court's ECF, system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants by first-class mail on May 1, 2015.

/s/ Robert Quinan

Robert L. Quinan, Jr. Assistant Attorney General

May 1, 2015